



Westside Housing

919 West 24th Street, Kansas City, MO 64108
816-421-8048 westsidehousing.org

August 1, 2022

Re: Requested Comments on Interagency CRA Notice on Proposed Rule-making
OCC Docket ID OCC-2022-0002
FDIC RIN 3064-AF81
Federal Reserve Docket No. R-1769 and RIN 7100-AG29

To Whom it May Concern:

I am responding to the Notice on Proposed Rule-making for reforming the Community Reinvestment Act (CRA).

Westside Housing Organization is a member of the NeighborWorks network. We have created a fledgling CDFI and we are also a Community Housing Development Organization (CHDO). The CRA has been a critical tool for Westside Housing Organization to develop partnerships with banking institutions to invest in the low to moderate income communities that we serve.

The proposed rule offers an automatic enrollment of activities undertaken by CDFIs as eligible for CRA credit. We believe that NeighborWorks organizations and CHDO's ought to be treated with a similar logic.

According to the draft, CDFIs play a key role in community revitalization as an effective driver of capital and, therefore "would be presumed to qualify for CRA credit given these organizations would need to meet specific criteria to prove that they have a mission of promoting community development and provide financial products and services to low- or moderate-income individuals and communities."

NeighborWorks organizations and Community Housing Development Organizations (CHDO's) similarly are working in low- and moderate-income communities and are required to meet criteria which would also make investments in them eligible for CRA credit. Therefore, I believe NeighborWorks organizations and CHDO's should also be presumed to qualify for CRA credit.

Automatically qualifying NeighborWorks organizations and CHDO's for CRA credit simplifies the process for banking institutions to invest in communities and eliminates duplicative paperwork.

Sincerely,



Gloria Ortiz-Fisher
Executive Director